

**REMARKS**

Claims 1-28 are pending. By this Amendment, claims 1-24 are amended and new claims 25-28 are added. Support for claims 25-28 can be found at least at Equation 17 on page 55 and at page 56, lines 14-17. No new matter is introduced.

The Office Action provisionally rejects claim 1 on the ground of non-statutory obviousness-type double patenting over claims 1 and 4 of copending Application No. 10/658,775. A Terminal Disclaimer is filed herewith. Accordingly, Applicants respectfully request withdrawal of the provisional rejection to claim 1.

The Office Action rejects claims 1-24 under 35 U.S.C. §103 over Liu et al. ("Algorithms for Computing the Distances Between Unordered Trees") in view of Dolan et al. (U.S. Patent No. 6,871,174). This rejection is respectfully traversed.

Regarding independent claims 1, 7, 13 and 19, the Office Action asserts that Liu discloses "a mapping between vertexes of the two R trees." However, Applicants respectfully submit that Liu does not disclose or suggest a mapping between vertexes *and edges* of the two R trees. Liu discloses three algorithms for computing distances between two rooted and unordered trees: structure preserving mapping (SSPD) in section 3.1, closest common ancestor mappings (CD) in section 3.2, and maximal closest common ancestor mapping (MCD) in section 3.3. These three algorithms are initially defined on page 90. All three algorithms disclose only a mapping between *vertexes* of two rooted and unordered trees and do not disclose or suggest mapping between *edges* of two trees. Further, in all figures showing mappings between trees, only vertexes are mapped, such as in Fig. 2, Fig. 6, Fig. 7, Fig. 8 and Fig. 12.

Furthermore, even if it is incorrectly assumed that Liu discloses a mapping between vertexes and edges of the two R/RO trees, Liu and Dolan, either alone or in combination, do not disclose or suggest "calculating a distance between the first text sentence and the second

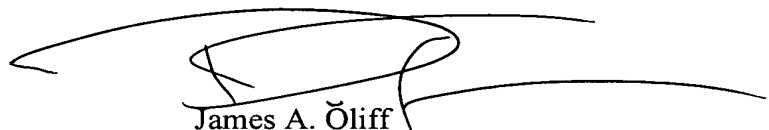
text sentence," as recited in claim 1 and similarly recited in claims 7, 13 and 19. Liu, as noted by the Office Action on page 4, is directed to calculating a distance between trees, and is not directed to calculating a distance between *text sentences*. Dolan also does not disclose or suggest *calculating a distance* between text sentences.

In view of the above, Liu and Dolan, either alone or in combination, do not disclose or suggest the subject matter recited in claims independent 1, 7, 13 and 19. Claims 2-6 depend from claim 1; claims 8-12 depend from claim 7; claims 14-18 depend from claim 13; and claims 20-24 depend from claim 19. Thus, Liu and Dolan do not disclose or suggest the subject matter recited in claims 1-24. Accordingly, Applicants respectfully request withdrawal of the rejection of claims 1-24 under 35 U.S.C. §103. New claims 25-28 are allowable by virtue of their dependencies on independent claims 1, 7, 13 and 19, respectively.

In view of the foregoing, it is respectfully submitted that this application is in condition for allowance. Favorable reconsideration and prompt allowance of claims 1-24 are earnestly solicited.

Should the Examiner believe that anything further would be desirable in order to place this application in even better condition for allowance, the Examiner is invited to contact the undersigned at the telephone number set forth below.

Respectfully submitted,



James A. Oliff  
Registration No. 27,075

Paul Tsou  
Registration No. 37,956

JAO:DCT/tjx

Attachments:

Petition for Extension of Time  
Terminal Disclaimer  
Amendment Transmittal

Date: October 5, 2007

**OLIFF & BERRIDGE, PLC**  
**P.O. Box 19928**  
**Alexandria, Virginia 22320**  
**Telephone: (703) 836-6400**

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